

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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Complaint on Sunday  
and Holiday Collections

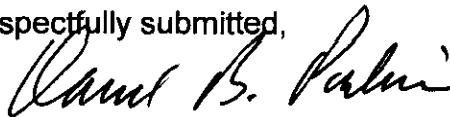
Docket No. C2001-1

DAVID B. POPKIN FOLLOW-UP INTERROGATORY TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-21 - 22] AND POTENTIAL MOTION FOR LATE  
ACCEPTANCE

August 24, 2001

This Interrogatory is being mailed on August 24, 2001, and should arrive at the Commission on August 27, 2001, under current USPS standards. In the event that it does not arrive by the deadline, I move for late acceptance.

Respectfully submitted,



August 24, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-21 Please refer to your Library Reference USPS-LR-6/C2001-1. [a] What is the relationship, if any, between the three-digit "Fac ID" and the ZIP Code area having that same three-digit prefix? [b] Please provide a listing of the ZIP Code areas that are covered in each of the facilities listed. For example, Elizabeth NJ 072 and Jersey City NJ 073 send their mail at all times to the D V Daniels P&DC 070. This information is needed to allow for a determination of the ZIP Code areas of the country that received mail processing on a given holiday. If the facility matches the ZIP Code area such as Hackensack 076, it is not necessary to indicate this except by an overall reference. [c] Confirm, or explain if you are unable to do so, that the listing of facilities not only includes Processing and Distribution Centers/Facilities but also includes Airport Mail Facilities and Priority Mail Processing Centers. [d] List and explain any other types of facilities that are included in this reference. [e] Explain the significance of the entries such as on Dr. King's Birthday in 2000 where D V Daniels 070 processed it's own mail as well as the mail that was forwarded there by Newark 071 however the Newark AMC and the No Jersey PMPC did not process any mail. This would appear to

indicate that First-Class Mail was processed but Priority [which is a part of the First-Class Mail system] and Express Mail was not. Please explain the significance to be drawn countrywide from the entries for Airport Mail Facilities, Priority Mail Processing Centers, and any other facilities that are not P&DC/P&DF's. [f] Explain the significance of the entries such as on Dr. King's Birthday in 2000 where Morgan Station 100 processed mail while J A Farley 101 and Church Street 102 did not. My understanding is that these facilities normally do not process any outgoing mail and therefore all of the mail from Manhattan was processed at Morgan Station. If this is not the case, provide the ZIP Codes in Manhattan that have their outgoing mail processed at each of the three facilities. [g] Provide a listing of any other facilities [in this Reference] in the country that do not normally process outgoing mail similar to 101 and 102 noted above. [h] What is the function of the Linthicum IMF 213 and explain why it does not process mail on holidays? [i] What is the function of the Sunset DDC 970 and Mt Hood DDC 976 and explain why they do not process mail on holidays? [j] Should the listing for Phoenix PMPPC 853 read PMPC? If not, what is the function of a PMPPC and explain why it does not process mail on a holiday?

DBP/USPS-22      The purpose of this interrogatory is to examine one of the eleven areas in the country as a case study and to determine the reasons why most, but not all, of the processing facilities either processed or did not process mail on a given holiday. I have omitted the AMF/AMC entries from the evaluation. Mail which has been forwarded to another facility counts as being processed. The area being considered for this case study is the Pacific Area. [a] On Dr King's Birthday 2000, explain why all of the facilities except Sacramento and Marysville processed mail. Provide the reasons why the decision maker at all but two of the facilities felt there was a need and also explain why the decision maker at two of the facilities felt that there was not a need to process mail. [b] Same as subpart a except for Dr King's Birthday 2001 where all facilities processed mail except Honolulu. [c] Same as subpart a except for Presidents Day 2000 where all facilities processed mail except Los Angeles, Sacramento, and Marysville. [d] Same as subpart a except for Presidents Day 2001 where all facilities processed mail except Honolulu. [e] Same as subpart a except for Columbus Day 1999 where all facilities

processed mail except Pasadena. [f] Same as subpart a except for Columbus Day 2000 where all facilities processed mail except Marina, Long Beach, and Bakersfield. [g] Same as subpart a except for Veterans Day 1999 where all facilities processed mail except Honolulu. [h] Same as subpart a except for Veterans Day 2000 where none of the facilities processed mail except Pasadena, M L Sellers, Oxnard, Santa Barbara, North Bay, and Redding. [i] Same as subpart a except for Thanksgiving 1999 where none of the facilities processed mail except Pasadena, Stockton, Sacramento, and Marysville. [j] Same as subpart a except for Thanksgiving 2000 where none of the facilities processed mail except San Francisco.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

August 24, 2001

  
David B. Popkin